

Chairman of the board, members of the board, ladies and gentlemen,

I would like to thank the NOP and the NOSB for giving me the opportunity to speak to you about the use of ethylene for flower induction in organic pineapple. I would like to take you back to April 1998 when we, in name of organic pineapple growers, researchers and distributors world wide, filed a petition with the NOP for approval of the use of Ethylene for organic pineapple flower induction. The petition extensively details the application methods and explains why Ethylene could and should be permitted for use as a flowering agent in organic pineapple production. I will give you a summary of the most important arguments:

- A flowering agent is imperative to achieve uniform fruit set and to produce fruit in an organized fashion on a farm to avoid uncontrollable pest and disease buildup. The control of these pests and diseases would require far more entries into the field for control, which would consume large quantities of energy.
- Without the use of a flowering agent, growers, processors and distributors encounter great logistical and operational problems in the growing, harvesting, packing, processing and sales of organic pineapple.
- Ethylene was recommended by the NOSB to be included on the National List of substances allowed for use as ingredients in or on processed organic products (DC 1999).

The petition was received by the former manager of the National Organic Program, Mr. Ted Rogers, who promised to keep the issue on the agenda. In November 1999 we learned that the decision on Ethylene had been postponed, and that more research was needed on Ethephon, for which OMRI was contracted.

For total clarity, once more, I want you, the NOP and the NOSB, to understand that we as organic pineapple growers and distributors mentioned in the letter, did not request the review of Ethephon. We just want to see Ethylene approved for flower induction in organic pineapple.

The one alternative would be having piles of rotting fruit alongside the organic pineapple fields and having the wind disperse the ethylene produced by these rotten fruits over the organic pineapple field. Another option would be to build fires alongside the fields and have the wind disperse the smoke (which contains ethylene) over the organic pineapple fields. Either option, although organic, is not viable for a number of reasons:

1. Pineapple, both organic and conventional, is planted according to increments in which each increment represents a certain age. This practice guarantees year-round production and thus year-round income. Flower induction must take place at exactly the right moment, otherwise the fruit will be either too small (fruit-set in the pre-mature stage) or too big. Fruit induction by using

the earlier mentioned alternatives will not allow for selective flower induction and will lead to very young, non-mature plants setting fruit and also to plants carrying fruits which are too heavy for their root and leaf system. That is something both agronomically and economically undesirable.

2. The rotten fruit will attract insects which will then have to be controlled which is not what organic agriculture is about and the smell of rotten fruit will definitely raise protests among the neighbors of the region where the organic pineapple is grown.
3. The fires do actively add to the green house effect and carbon particles are known health hazards. Residents will not be pleased, to say the least, if all of a sudden their homes are filled with smoke just because their house is downwind from an organic pineapple farm. Furthermore, to control these fires is a difficult matter which might just be too much for an organic pineapple grower. Recent experience in New Mexico and Florida demonstrates just how delicate this matter is.

So, I would like to ask the Board on behalf of all Organic Pineapple growers, large and small, for the approval of the use of (synthetic) Ethylene for flower induction in organic pineapple. Remember that the NOSB approved the use of (synthetic) Ethylene in citrus and degreening of tropical fruit (where it is applied much closer to consumption than if used in flower induction) and thereby had to consider §6518 (m) of the OFPA. If approved for use in citrus and degreening of tropical fruits, Ethylene cannot reasonably be rejected for use in flower induction in organic pineapple. Actually, the NOSB Crops Committee feels the same way, as they state in their Material Recommendation Report. If the board chooses to recommend the inclusion of ethylene in the National List under the restriction that it is phased-out within three years (as recommended by the Crops Committee), we ask that the condition is added that the prohibition should only then go into effect if natural sources of ethylene or other more acceptable sources of ethylene are commercially available. This same condition is already present in the NOP § 205.204(a)(1) regarding the use of non-organically produced planting stock, which is allowed when an equivalent organically produced variety is not commercially available. This same condition should be valid for the use of Ethylene.

I thank you for your attention.